

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

EBONY BURROUGHS,

Plaintiff,

v.

THE KROGER CO.

Defendant.

Civil Action File No.:

\_\_\_\_\_

Removed from Fulton County State  
Court, Civil Action No. 23EV006980

JURY TRIAL DEMANDED

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**DEFENDANT THE KROGER CO.'S CERTIFICATE OF INTERESTED  
PERSONS AND CORPORATE DISCLOSURE STATEMENT**

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COMES NOW Defendant The Kroger Co., pursuant to Fed. R. of Civ. P. 7.1 and L.R. 3.3, and hereby files its Certificate of Interested Persons and Corporate Disclosure Statement as follows:

- (1) The undersigned certifies that the following is a full and complete list of all parties, including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor:
  - (a) Plaintiff Ebony Burroughs; and,

- (b) The Kroger Co.
- (2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this case:
- (a) Plaintiff Ebony Burroughs;
  - (b) Keith R. Foster, Esq., The Foster Firm, LLC;
  - (c) The Kroger Co.; and
  - (d) Any other individual or entity with a financial interest in the outcome of the trial.
- (3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this case:
- (a) Counsel for Plaintiff Keith R. Foster of The Foster Firm, LLC.;
  - (b) Counsel for Defendants The Kroger Co.: Matthew G. Moffett, Esq. and Jeffrey M. Wasick, Esq. of Gray, Rust, St. Amand, Moffett & Brieske, L.L.P.

(4) The undersigned further certifies that the following is a full and complete list of the citizenship of every individual or entity whose citizenship is attributed to a party or proposed intervenor on whose behalf this certificate is filed:

(a) Plaintiff(s):

i. Plaintiff Ebony Burroughs is a Georgia citizen.

(b) Defendant(s):

i. The Kroger Co. is an Ohio citizen.

Respectfully submitted, this the 20th day of December, 2023.

**GRAY, RUST, ST. AMAND,  
MOFFETT & BRIESKE, L.L.P.**  
950 East Paces Ferry Road, N.E.  
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/s/ Sarah Raquel L. Lisle  
Matthew G. Moffett  
Georgia Bar No. 515323  
Sarah Raquel L. Lisle  
Georgia Bar No. 412593  
*Attorneys for Defendant The Kroger  
Co.*

CERTIFICATE OF SERVICE AND OF COMPLIANCE WITH L.R. 5.1

This is to certify that on this date, the undersigned served a true and correct copy of the foregoing pleading with the Clerk of Court using the CM/ECF system and served all parties of record via electronic service through the CM/ECF system to:

Keith R. Foster, Esq.  
THE FOSTER FIRM, LLC  
One Crown Center  
1895 Phoenix Blvd., Suite 110  
Atlanta, Georgia 30349  
[kfoster@tfflaw.net](mailto:kfoster@tfflaw.net)

Further, this is to certify that the foregoing pleading complies with the font and point selections approved by the Court in Local Rule 5.1. It is prepared in Times New Roman 14-point font.

Respectfully submitted, this the 20th day of December, 2023.

**GRAY, RUST, ST. AMAND,  
MOFFETT & BRIESKE, L.L.P.**  
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/s/ Sarah Raquel L. Lisle  
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Co.*